

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

THE JONES GROUP OF MISSISSIPPI, LLC,

Plaintiff,

versus

ZURICH AMERICAN INSURANCE COMPANY,

Defendant.

CAUSE NO.:
3:20-cv-00151-CWR-FKB

**ZURICH AMERICAN INSURANCE COMPANY’S MOTION FOR EXTENSION OF
TIME TO FILE RESPONSIVE PLEADINGS TO PLAINTIFF’S COMPLAINT**

NOW INTO COURT, through undersigned counsel, comes the defendant, **Zurich American Insurance Company**, who respectfully requests that this Honorable Court grant a thirty-day (30-day) extension of time for the defendant to file responsive pleadings to the Complaint filed by the plaintiff, The Jones Group of Mississippi, LLC.

The Complaint was filed on March 9, 2020, and it appears from the court docket that the defendant may have been served on or around March 10, 2020. Undersigned counsel was recently retained to represent the defendant and due to Covid-19 closures, undersigned counsel is still waiting to confer with its client and is also awaiting transfer of initial file materials. The requested extension is necessary for undersigned counsel to obtain documents and information relevant to the Plaintiff’s Complaint and prepare responsive pleadings.

WHEREFORE, after due consideration had, the defendant requests that this Honorable Court grant a thirty-day (30-day) extension of time for the defendant to file responsive pleadings to the Plaintiff's Petition for Damages.

Respectfully submitted,



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*Attorneys for Defendant,
Zurich American Insurance Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon counsel of record for plaintiff via CM/ECF, this 6th day of April, 2020.



OLIVIA Y. TRUONG